

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Mother Doe, Individually and as the Mother)	C.A. No.: 3:18-cv-02731-CMC
and Natural Guardian for Jane Doe, a Minor,)	
)	
Plaintiff,)	
)	
v.)	FRCP RULE 26(a)(3) PRETRIAL
)	DISCLOSURES ON BEHALF OF
)	DEFENDANT SHERIFF LOTT
Richland County School District Two, Sheriff)	
of Richland County in his official capacity, and)	
Jamel Bradley,)	
)	
Defendants.)	
)	

Pursuant to Rule 26(a)(3), the Defendant Sheriff in his official capacity hereby provides the following:

1. The name and, if not previously provided, the address and telephone number of each witness -- separately identifying those the party expects to present and those it may call if the need arises.

RESPONSE

This Defendant anticipates presenting the following witnesses in his case-in-chief:

- (a) **Sheriff Leon Lott
Richland County Sheriff's Department ("RCSD")
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (b) **John Ewing
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**

This Defendant anticipates calling the following witnesses in his case-in-chief if the need arises:

- (a) **Jamel Bradley
303 Ashley Place
Columbia, South Carolina 29229
(803) 319-7608**
- (b) **Kathryn Campbell Hubbard
Fifth Circuit Solicitor's Office
Post Office Box 192
Columbia, South Carolina 29202
(803) 576-1800**
- (c) **Bonita Cunningham
Moncrief Army Health Clinic
4500 Stuart Street
Columbia, South Carolina 29207
(803) 562-2106**
- (d) **Mia Davidian, M.D.
Moncrief Army Health Clinic
4500 Stuart Street
Columbia, South Carolina 29207
(803) 562-2106**
- (e) **Dr. Baron Davis
Richland School District Two
763 Fashion Drive
Columbia, South Carolina 29229
(803) 787-1910**
- (f) **Mother Doe
c/o Plaintiff's counsel**
- (g) **Jane Doe
c/o Plaintiff's counsel**
- (h) **Martha Fenske
1401 Hampton St.,
Columbia, South Carolina 29201
(972) 615- 2596**
- (i) **Allison M. Foster, PhD
Metropolitan Children's Advocacy Center
3710 Landmark Drive, Suite 300
Columbia, South Carolina 29204
(803) 898-1470**
- (j) **Brian Godfrey
Richland County Sheriff's Department
5623 Two Notch Road**

**Columbia, South Carolina 29202
(803) 576-3000**

- (k) Heidi Jackson
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (l) Keenan Johnson
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (m) Briana Kramer
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (n) Chris Lindler
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (o) Jade Louallen
Address and phone number unknown**
- (p) Larry Payne
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**
- (q) April Shell
Summit Parkway Middle School
200 Summit Parkway
Columbia, South Carolina 29229
(803) 699-3580**
- (r) Stan Smith
Richland County Sheriff's Department
5623 Two Notch Road
Columbia, South Carolina 29202
(803) 576-3000**

- (s) "Target student"
c/o Taylor Bell, Esq.
 - (t) Jeff Temoney
Spring Valley High School
120 Sparkleberry Lane
Columbia, South Carolina 29229
-

In addition to the above-named witnesses, the Defendant Sheriff reserves the right to present any witness identified or listed by any other party. Additionally, to the extent necessary, this Defendant reserves the right to present a record custodian to authenticate records.

2. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

RESPONSE

Reserving all rights pursuant to Rule 32, Fed. R. Civ. P., the Defendant Sheriff expects to present its witnesses for live testimony.

3. An identification of each document or other exhibit, including summaries of other evidence -- separately identifying those items the party expects to offer and those it may offer if the need arises.

RESPONSE

This Defendant anticipates presenting the following exhibits in his case-in-chief:

- (a) **RCSD Body Worn Camera (BWC) videos dated April 17, 2018 by Deputies Keenan Johnson and Briana Kramer**
- (b) **Forensic Interview videos of Jane Doe with Allison M. Foster, Ph.D dated April 18, 2020 and April 18, 2020**
- (c) **RCSD SRO Evaluation Forms, 2014-17 [Dkt 132-4]**
- (d) **Moncrief Army Health Clinic patient records for Jane Doe**
- (e) **E-mail communications between Jane Doe and Bradley (February 2017 through March 2018)**

This Defendant anticipates presenting the following exhibits in his case-in-chief if the need arises:

- (a) Bradley personnel file [00432-A-001 through 00432-A-139]**
 - (b) Bradley previous IA history [00432-B-001 through 00432-B-039]**
 - (c) Bradley 2018 IA file [00432-C-001 through 00432-C-016]**
 - (d) Criminal Investigation Records [00432-D-001 through 00432-D-061]**
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Should the need arise and to the extent admissible, this Defendant reserves the right to offer any exhibit listed by any party in their respective pretrial disclosures.

CROWE LAFAVE, LLC

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*Counsel for the Defendant
Sheriff Lott in his official capacity*

Columbia, South Carolina

May 18, 2020